

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
THE COMMONWEALTH OF PUERTO RICO, et al.,
Debtors¹**

**PROMESA
TITLE III
Case No. 17-BK-3283
(LTS)**

**CERTIFICATE OF NO OBJECTION REGARDING THE URGENT SUPPLEMENTAL
MOTION REQUESTING ORDER FOR ALLOWANCE OF ADMINISTRATIVE
EXPENSE PRIORITY CLAIM AND REQUEST FOR IMMEDIATE PAYMENT FILED
BY CORRECTION OFFICERS OF THE DEPARTMENT OF CORRECTIONS AND
REHABILITATION OF THE COMMONWEALTH OF
PUERTO RICO PURSUANT TO § 503(b) (1) (A) (ii)**

To the Honorable United States District Court Judge Laura Taylor Swain:

NOW COMES the group creditors in the consolidated judgment dated April 22, 2016 in the litigation captioned Norberto Tomassini et als case no. A MI2003-0143 and Ivan Ayala et als. Case no. A PE2005-0049, against the Department of Correction and Rehabilitation of the Commonwealth of Puerto Rico (the "DCR"), by and through the undersigned attorney, to respectfully state, allege and pray:

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

1. On September 28, 2021, the group of creditors included in the consolidated Judgment dated April 22, 2016 in the litigation captioned Norberto Tomassini et als case no. A MI2003-0143 and Ivan Ayala et als. Case no. A PE2005-0049, against the Department of Correction and Rehabilitation of the Commonwealth of Puerto Rico (the “DCR”), filed an Urgent Supplemental Motion Requesting Order for Allowance of Administrative Expense Priority Claim and Request for immediate Payment, filed by Correction Officers of the Department of Corrections and Rehabilitation of the Commonwealth of Puerto Rico, pursuant to § 503(b)(1)(A) (ii) of the Federal Rules of Bankruptcy Code [Case No. 17-03283-LTS, ECF No. 18282 (the “Motion”).

2. Objections to the Motion were to be filed and served no later than October 13, 2021 at 4:00 p.m. (AST) (the “Objection Deadline”). According to the Fifteenth Amended Notice, Case Management and Administrative Procedures [ECF No. 17127-1] (the “Case Management Procedures”), the Court may enter an order granting a request for relief without a hearing upon receipt of a certificate of no objection (“CNO”, as defined in the Case Management Procedures). See Case Management Procedures, Section III, paragraph P.

3. In accordance with the Case Management Procedures, the undersigned attorney hereby states that we are filing this CNO after the expiration of the Objection Deadline. Also, further certifies that we have reviewed the Court’s docket in this case after the Objection Deadline and that no applicable objection, responsive pleading, or request for a hearing with respect to the Motion appears on the docket.

WHEREFORE, the appearing Correctional Officers respectfully requests that the Court enter the proposed order attached hereto as Exhibit A at the Court's earliest convenience.

I HEREBY CERTIFY, in accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court's Fifteenth Amended Notice, Case Management and Administrative Procedures Order [ECF No. 17127-1] (the "CMP Order"), that we electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all CM/ECF participants in this case. I further certify that, on this same date, I served the foregoing upon all the Standard Parties as identified and defined in the Court's CMP Order, as well as upon all of the parties identified in the Master Service List maintained at <https://cases.primeclerk.com/puertorico/>.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 3rd day of November, 2021.

ATTORNEY FOR THE CORRECTION OFFICERS

By: /s/ IVONNE GONZALEZ-MORALES

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